

Application No.: 10/763,727
Amendment dated: August 3, 2006
Reply to Office Action dated: February 3, 2006

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REMARKS/ARGUMENTS

Claims 10-21 are pending in the application. Claims 10, 13-16 and 19-21 are rejected under 35 U.S.C. §102(a), as being anticipated by Shiraishi et al. (JP 2002-074870), hereinafter ("Shiraishi"). Claims 11-12 and 17-18 are rejected under 35 U.S.C. §103(a) as being unpatentable over Shiraishi et al. (JP 2002-074870), hereinafter ("Shiraishi"). The title is amended to comply with the Examiner's request.

Applicants submit the cited reference Shiraishi does not teach, suggest or describe at least "[a]n actuator component comprising: at least one layer of electrically-conductive material; and at least one layer of electrically-insulative material, wherein said conductive material and said insulative material are to be applied to an actuator finger *one layer upon another in an alternating manner...*" (e.g., as described in claim 10).

The Office Action asserts that Shiraishi teaches an electrically insulative material (including 60 above lower-most 61), wherein the conductive material (citing element 61) and the insulative material are to be applied to an actuator finger (52a) one layer upon another in an alternating manner, citing Figure 6. See Office Action dated 2/3/2006, paragraph 4. Applicants disagree for at least the reasons described below.

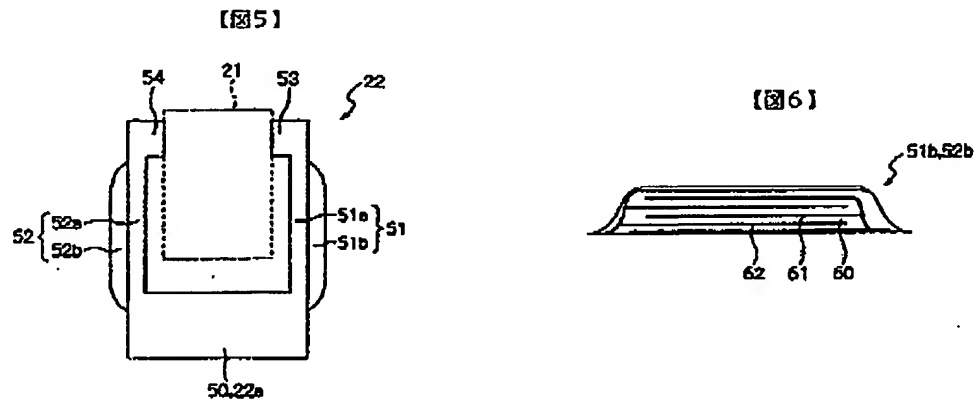
First, Applicants disagree with the Office Action's contention that element 60 is the equivalent of the "insulative material", element 61 is the equivalent of the "conductive material" and element 52a is the equivalent of the "actuator finger" as described in embodiments of the present application. They are not. However, even if one were to assume, only *arguendo*, that they are equivalents, the Shiraishi reference would still fail to describe a

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conductive material and a insulative material applied to an actuator finger *one layer upon another in an alternating manner*. As stated above, to support its rejection, the Office Action merely cites Figure 6. The citation is inadequate to support a proper rejection for at least the following reasons. Figure 6 of Shiraishi is reproduced below:



As discussed above, the Office Action cites to Figure 6 (right) for support of its claim that Shiraishi describes a conductive material and an insulative material applied to an actuator finger. Figure 6 merely shows the multiple layers cited by the Office Action as part of one ready-made component of the actuator structure shown in Figure 5 (element 51b and 52b). It does not show the a conductive material and a insulative material applied to an actuator finger *one layer upon another in an alternating manner*. Therefore the Office Action's current rejection is inadequate.

The description of Shiraishi fails to describe these limitations as well. Layers 60, 61, and 62 of the Shiraishi reference are discussed in detail in paragraphs 0051 and 0052. Paragraph 0051 describes the expansion and contraction operations of "electrostriction

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ingredient layer 60", "single-electrode layer 61", and "grand electrode layer 62". It further describes the terminal electrode connections used to achieve this purpose. Paragraph 0052 discusses the describes the relationship of the electric magnetic field to expansion and contraction (*i.e.*, potential difference "in agreement" with direction of polarization leads to expansion, and potential difference "contrary" to the direction of polarization leads to contraction). None of the other sections of Shiraishi describe layers 60, 61, and 62 in detail. Therefore, Applicants submit neither these two sections describe the alleged conductive and insulative layer equivalents, nor does the Shiraishi reference as a whole describes at least a conductive material and an insulative material applied to an actuator finger *one layer upon another in an alternating manner (e.g., as described in the embodiment of claim 10)*.

Therefore, since for at least the preceding reasons each and every limitation is not taught or suggested in the Shiraishi references. Applicants submit it is inadequate to support proper 35 U.S.C. §102(b) and §103(a) rejections, and independent claim 10 should be allowed. Independent claim 16 includes similar limitations and therefore is also in condition for allowance for similar reasons. Claims 11-15 and 17-21 depend from allowable independent claims and therefore are allowable as well.

The Applicant respectfully submits that this application is in condition for allowance. A Notice of Allowance is earnestly solicited. The Examiner is invited to contact the undersigned at (408) 975-7500 to discuss any matter concerning this application.

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The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. §1.16 or §1.17 to Deposit Account No. 11-0600.

Respectfully submitted

KENYON & KENYON LLP

Dated: August 3, 2006

By: 

Samit Bhattacharya
(Reg. No. 51,469)

KENYON & KENYON LLP
333 West San Carlos, Street 600
San Jose, California 95110

Telephone: (408) 975-7500
Facsimile: (408) 975-7501